

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re: *
* PROMESA Title III
THE FINANCIAL OVERSIGHT AND *
MANAGEMENT BOARD FOR PUERTO RICO, * Case No. 17-BK-3283-LTS
* (Jointly Administered)
as representative of *
* RE: ECF No. 15356, 15363,
THE COMMONWEALTH OF PUERTO RICO, * 15486, 15511, 15572,
et al. * 15782
*
Debtors. *

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* PROMESA Title III
FREDERIC CHARDON DUBOS, *
*
Movant, *
*
v. *
*
THE FINANCIAL OVERSIGHT AND *
MANAGEMENT BOARD FOR PUERTO RICO, *
*
as representative of *
*
THE COMMONWEALTH OF PUERTO RICO, *
*
Respondent. *

URGENT CONSENSUAL MOTION REQUESTING EXTENSION OF DEADLINES

TO THE HONORABLE COURT:

NOW COMES movant the undersigned attorney on his own behalf
and respectfully states as follows:

1. This Honorable Court entered an Order Granting Consensual

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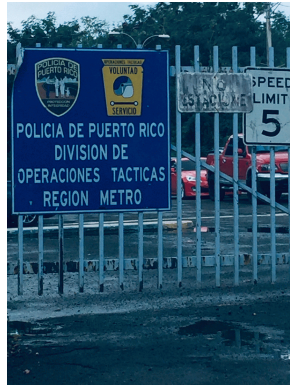
1 Motion for Extension of Deadlines, ECF No. 15643 (the "Order").

2 2. Pursuant to the Order debtor filed its Objection at ECF No.
3 15782 (the "Objection").
4

5 3. Pursuant to the Order movant has to file his reply today
6 February 16, 2021.

7 4. Movant has attempted to locate the referenced motor vehicle
8 to include that information in his reply.
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10 5. Movant last saw the motor vehicle at the police station
11 located at Iturregui Street in Country Club as shown in the picture
12 below.



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21 6. Movant requests the deadline to file his reply to the
22 Objection be extended to **February 19, 2021, at 5:00 p.m. (Atlantic**
23 **Standard Time)**.

24 **ATTORNEY CERTIFICATION**

25
26 The undersigned attorney hereby CERTIFIES that on this day
27 a reasonable, good-faith telephone communication took place
28

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1 with counsel of the law firm Proskauer Rose LLP and they
2 consented to the requested extension of deadlines.
3 Therefore, there is no knowledge that there will be an
4 objection to this Urgent Motion.
5

6 WHEREFORE, movant the undersigned attorney on his own behalf
7 respectfully requests that for the above stated reasons this
8 Honorable Court grant this Urgent Consensual Motion Requesting
9 Extension of Deadlines.
10

11 Respectfully submitted, in Carolina, Puerto Rico this 16th day
12 of February, 2021.

13 **CERTIFICATE OF SERVICE, LOCAL RULE 5005-4(h)(1), P.R. LBR**

14
15 Movant hereby certifies that on this day, Movant electronically
16 filed the foregoing with the Clerk of the Court uploading the same
17 using the CM/ECF System which will send notification of such filing
18 to the all CM/ECF participants.
19

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21 s/Frederic Chardon Dubos

22 **Frederic Chardon Dubos**

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